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October 10, 2001

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ex Parte Submission

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
Room TW-B-204
445 12th Street, S.W.
Washington, D.C.

Re: Joint Application by BellSouth Corporation, et al, for Provision of In-Region, InterLATA Services in Georgia and Louisiana, CC Docket No. 01-277

ERRATA FILING

Dear Ms. Salas:

On October 2, 2001, BellSouth filed a Joint Application for Provision of In-Region, InterLATA Services in Georgia and Louisiana. That application included an affidavit of Victor K. Wakeling. Due to an inadvertent totaling error, some of the information in Mr. Wakeling's affidavit is incorrect. In particular, the affidavit misstated BellSouth's estimate of CLEC lines in Louisiana using BellSouth's Method 2 (which is described in the affidavit). The correct figures are included in the attached replacement pages to the affidavit (page 14), to exhibits VW-9 (pages 1 and 3) and VW-15, and to BellSouth's brief (pages 1 and 20). As those attachments demonstrate, BellSouth's Method 2 estimate of the CLEC share of total lines in Louisiana is 8.1% and its estimate of the CLEC share of business lines is 16.1%.

Pursuant to the Commission's rules, I am enclosing one original copy of this letter with the pages from the confidential exhibits. Additionally, I am enclosing two copies of this letter with those exhibits redacted for public inspection. Inquiries regarding access to the confidential material submitted with this letter should be addressed to Laura Brennan, Kellogg, Huber, Hansen, Todd & Evans, 1615 M Street, N.W., Suite 400, Washington, D.C., 20036, 202-367- 7821.

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KELLOGG, HUBER, HANSEN, TODD & EVANS, P.L.L.C.

Please date-stamp and return one copy. If you have any questions, please contact me at (202) 326-7975. Thank you for your assistance in this matter.

Yours truly,



Sean A. Lev

Attachments

cc: Susan Pié (FCC CCB)
Leon Bowles (GPSC)
Arnold Chauviere (LPSC)
Cynthia Lewis (DOJ)
Lauren Fishbein (DOJ)
James Davis-Smith (DOJ)
Qualex (FCC copy contractor) (Redacted Version Only)

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exclusively or in combination with BellSouth UNEs and/or UNE-Ps. A significant number of facilities-based lines – 4,381 – serve residential customers while 143,606 serve businesses. Also, as of July 2001, 38 resale-only CLECs were providing a total of 57,025 access lines in BellSouth’s Louisiana service area. Table 3 also shows that 56,134 of these were residential lines.

21. For Method 2 in Louisiana, BellSouth also relies upon the E911 Listings and/or UNE-P data extant for 24 facilities-based CLECs (as compared to the 31 facilities-based CLECs under Method 1). Using this data, BellSouth estimates that CLECs are serving 119,595 facilities-based lines. *See* Exhibits VW-9 and VW-15. These 24 facilities-based CLECs also serve 28,296 resold lines. When the lines from the 38 resale-only CLECs are included, the overall total of CLEC lines becomes 204,916, which translates to 8.1% of the local access lines in BellSouth’s service area in Louisiana.

TABLE 4 Method 2 - LOUISIANA: using E911 and UNE-Ps for facilities-based lines

CLEC PROVIDERS	Number of CLECs	RESIDENCE Lines	BUSINESS Lines	Total Lines
FACILITIES-BASED E911 Listings + UNE-P	24	4,233 Resale 4,392 Facilities-Based	24,063 Resale 115,203 Facilities-Based	28,296 Resale 119,595 Facilities-based
RESALE – ONLY	38	56,134	891	57,025 Resale
CLEC TOTAL	62	64,759	140,157	204,916
TOTAL LINES		1,668,247	870,304	2,538,551
% of Lines		3.9 %	16.1 %	8.1 %

22. Among the many facilities-based CLECs in Louisiana are Advanced Tel. (EATEL), Cox Louisiana Telecom, Intermedia Communications, ITC^DeltaCom, KMC Telecom,

Wakeling Affidavit - Revised Exhibit VW-9

CLECs with Over 10 Lines
in BellSouth LOUISIANA Area
Method Two (911 Listings + UNE-Ps)

REVISED
Exhibit VW-9
Redacted for
Public Inspection

LOUISIANA JULY 2001		Resold Lines		----- Estimated -----			Total Local Lines
Facilities-Based: Method 2 (911s + UNE-Ps)		RES.	BUS.	Facilities-based		Fac.-based	
				Res Lines	Bus Lines	TOTAL Lines	
				=====	METHOD TWO	=====	
1	ACCESS INTEGRATED NETWORKS						
2	ADELPHIA BUS. SOLUTIONS (fka Hyperion)						
3	ADVANCED TEL - EATEL (incls. Actel Integrated, ConnectSouth, TelAmerica)						
4	AT&T COMMUN. (incls. Teleport-TCG)						
5	BUSINESS TELECOM INC. (BTI)						
6	CAPROCK TELECOM (dba IWL Connect) (MCLEODUSA)						
7	COLUMBIA TELECOMM (dba AXESSA)						
8	COX LOUISIANA TELCOM						
9	CRG INTERN'L dba NETWORK ONE						
10	E.SPIRE COMM. (ACSI)						
11	GLOBAL NAPS						
12	INTERMEDIA COMM (ICI)						
13	ITC*DELTACOM						
14	KMC TELECOM INC.						
15	MADISON RIVER (incls. Mebtel, American MetroComm)						
16	NETWORK TELEPH. (incl LIGHTNETWORKS)						
17	NEWSOUTH COMM (incl. UniversalCom, Data & Electr. Svcs)						
18	SPRINT COMMUNICATIONS						
19	STRATOS TELECOM (incls. Shell Offshore, Rig Tel., DATACOM)						
20	TELIGENT SERVICES						
21	THE OTHER PHONE CO (dba AccessOne, TALK.COM; incls Omnical)						
22	US LEC						
23	XSPEDIUS (prev LEC Unwired LLC)						
24	Z-TEL COMM						
METHOD TWO: Facilities-Based Lines		4,233	24,063	4,392	115,203	119,595	147,891

OTHER CLECs (No 911 Listings, No UNE-Platforms)	
1	CENTURY TEL SOLUTIONS
2	COVAD COMM (aka BLUESTAR)
3	DOLNET COMM
4	LEVEL 3
5	NEW EDGE COMMUNICATIONS
6	PATHNET
7	RESERVE TELECOM (aka RESERVE LD)

**CLECs with Over 10 Lines
in BellSouth LOUISIANA Area
Method Two (911 Listings + UNE-Ps)**

REVISED
Exhibit VW-9
Redacted for
Public Inspection

LOUISIANA JULY 2001	Resold Lines		----- Estimated -----			Total Local Lines
			Facilities-based		Fac.-based	
	RES.	BUS.	Res Lines	Bus Lines	TOTAL Lines	
TOTAL CLEC LINES in BellSouth-Louisiana Area [CLECs with 10 or more lines]	60,367	24,954	4,392	115,203	119,595	204,916
METHOD TWO ESTIMATE						

Total	
Resold -->	85,321

CLECs Over 10 Lines - JULY 2001	62	METHOD TWO
FACILITIES-BASED CLECs ----->	24	
RESALE ONLY CLECs ----->	38	

CLEC Line Share Estimate =	204,916
JULY 2001	204,916 + 2,333,635
	= 8.1%
	METHOD TWO

Wakeling Affidavit - Revised Exhibit VW-15

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INFORMATION

Estimation of Facilities-Based CLEC Lines in BellSouth LOUISIANA Area METHOD 2 (911 Listings + UNE-Ps)

REVISED
Exhibit VW-15
Redacted for
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LOUISIANA JULY 2001		Estimated			911 LISTINGS		UNE - Platforms	
		Facilities-based		Fac.-based	RES	BUS	Residence	Business
Facilities-Based Lines: Method 2		Res Lines	Bus Lines	TOTAL Lines	FACILITIES-BASED INDICATORS			
1	ACCESS INTEGRATED NETWORKS							
2	ADELPHIA BUS. SOLUTIONS (fka Hyperion)							
3	ADVANCED TEL - EATEL (incls. Actel Integrated, ConnectSouth, TelAmerica)							
4	AT&T COMMUN. (incls. Teleport-TCG)							
5	BUSINESS TELECOM INC. (BTI)							
6	CAPROCK TELECOM (dba IVL Connect) (MCLEODUSA)							
7	COLUMBIA TELECOMM (dba AXESSA)							
8	COX LOUISIANA TELCOM							
9	CRG INTERN'L dba NETWORK ONE							
10	E.SPIRE COMM. (ACSI)							
11	GLOBAL NAPS							
12	INTERMEDIA COMM. (ICI)							
13	ITC*DELTACOM							
14	KMC TELECOM INC.							
15	MADISON RIVER (incls. Mebtel, American MetroComm)							
16	NETWORK TELEPH. (incl LIGHTNETWORKS)							
17	NEWSOUTH COMM (incl. UniversalCom, Data & Electr. Svcs)							
18	SPRINT COMMUNICATIONS							
19	STRATOS TELECOM (incls. Shell Offshore, Rig Tel., DATACOM)							
20	TELIGENT SERVICES							
21	THE OTHER PHONE CO (dba AccessOne, TALK.COM; incls Omnicall)							
22	US LEC							
23	XSPEDIUS (prev LEC Unwired LLC)							
24	Z-TEL COMM							
METHOD TWO: Facilities-Based Lines		4,392	115,203	119,595	865	103,766	3,527	11,437

1	OTHER CLECs (No 911 Listings, No UNE-Platforms)
2	CENTROTEL SOLUTIONS
3	COVAD COMM (fka BLUESTAR)
4	DSUNET COMM
5	LEVEL 3
6	NEW EDGE COMMUNICATIONS
7	PATHNET
8	RESERVE TELECOM (aka RESERVE LD)

" - " = NO DATA

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BellSouth Georgia/Louisiana 271 Brief - Revised Pages 1 & 20

INTRODUCTION AND EXECUTIVE SUMMARY

Pursuant to section 271(d)(1) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996 (the “1996 Act” or “Act”), 47 U.S.C. § 271(d)(1), BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc. (collectively, “BellSouth”) hereby seek authorization to provide interLATA services originating in the States of Georgia and Louisiana, including all services treated as such under 47 U.S.C. § 271(j).

The local telecommunications markets in Georgia and Louisiana are not just open, they are highly competitive. Even using an extremely conservative methodology, CLECs in Georgia now serve more than 798,000 access lines in BellSouth’s territory, with nearly 700,000 facilities-based lines and 100,000 resold lines. That figure represents approximately 27.5% of the business market, 8.7% of the residential market, and 16.4% of the total access lines in BellSouth’s Georgia territory.¹ The Louisiana market also exhibits vibrant local competition. BellSouth conservatively estimates that CLECs have obtained 8.1% of the lines in BellSouth’s Louisiana territory.² This Commission’s figures show even greater competition. Indeed, the Commission’s recently issued competition report concludes that, based on market share data, Louisiana is the third most competitive state in the nation.³

These real-world facts provide a crucial backdrop against which the Commission should review all issues in this case. The indisputable reality is that CLECs can and do compete very

¹ See *Wakeling Aff.* ¶ 18 (App. A, Tab V).

² See *id.* ¶ 21.

³ See Industry Analysis Div., Common Carrier Bureau, FCC, *Local Telephone Competition: Status as of December 31, 2000* (May 2001) (“FCC Local Competition Report”).

AccessOne, Cox, and ITC^DeltaCom, each of which independently satisfies the requirements of Track A. *See id.* ¶ 22.

As in Georgia, moreover, CLECs competing in Louisiana are providing local telephone exchange service to residential and business subscribers exclusively or predominantly over their own facilities. Facilities-based CLECs operating in Louisiana serve at least 8,600 residential access lines and at least 139,000 business access lines in the state. *See id.* ¶ 21 & Table 4. Overall, BellSouth estimates that CLECs provide local service to at least 204,000 (and probably closer to 234,000) access lines. *Id.* ¶¶ 20-21 & Tables 3-4. Although not as dramatic as the level of CLEC entry in Georgia, this number nonetheless represents at least 16.1% of the business market, 3.9% of the residential market, and 8.1% of the total access lines in BellSouth's territory in Louisiana. *Id.*

CLEC collocation arrangements further demonstrate the openness of the local market in Louisiana. BellSouth has completed nearly 470 collocation arrangements in Louisiana, with at least one collocation arrangement completed in 64 of 228 BellSouth wire centers. *See id.* ¶ 24. As in Georgia, CLECs are collocated heavily in the Louisiana wire centers with greater density. Of the total collocation arrangements, 268 are located in 19 BellSouth wire centers. *See id.* Table 6. From these 19 wire centers alone, facilities-based CLECs can reach 30% and 47% of residential and business access lines in BellSouth's territory, respectively. *See id.* From their existing collocation arrangements, facilities-based Louisiana CLECs can reach 73% and 86% of BellSouth's total residence and business access lines, respectively. *See id.*

BellSouth clearly meets the requirements of Track A in both Georgia and Louisiana. *See* 47 U.S.C. § 271(c)(1)(A).